

In re:

ASSIGNMENT FOR BENEFIT OF  
CREDITORS OF:

IN THE CIRCUIT COURT OF THE  
ELEVENTH JUDICIAL CIRCUIT IN AND  
FOR MIAMI-DADE COUNTY, FLORIDA

PROPER BSD, LLC, a Colorado limited  
liability company

Assignor,

To:

NIR GAVRA,

Case No. 2023-018976-CA-01

Division: CA44

Assignee

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**MOTION TO APPROVE EMPLOYMENT OF MEIR HELLER AND THE E. LANDAU  
FIRM AS ISRAELI COUNSEL**

Assignee, Nir Gavra (the “Assignee”), files this Motion to Approve the Employment of Meir Heller and the firm of E. Landau as the Assignee’s counsel for matters of Israeli law and states:

1. On June 21, 2023, an assignment for the benefit of creditors was duly executed by the Assignor, Proper BSD, LLC (the “Assignor”), assigning all of its assets to the Assignee under Chapter 727 of the Florida Statutes.
2. On June 27, 2023, (the “Petition Date”), a Petition was filed with the Clerk of this Court commencing this assignment for the benefit of creditors proceeding.
3. F.S. §727.108(7) requires that the Assignee “to the extent necessary, employ at the expense of the estate one or more appraisers, auctioneers, accountants, attorneys, or other professional persons, to assist the Assignee carrying out his or her duties under this chapter.
4. Prior to commencing the assignment, the Assignor’s business consisted of holding direct or indirect interests in limited liability companies which owned and managed real estate

projects throughout Florida.

5. The creditors listed on the Assignor's schedules include over 150 creditors from Israel. Upon information and belief, these creditors loaned money to or invested money with the Assignor to fund its acquisitions in Florida.

6. Most of Israeli creditors have filed proofs of claim in his assignment case. The claims attach contracts or agreements in Hebrew and appear to be based on matters of Israeli law.

7. Under Florida Statute § 727.108(10), the Assignee is required to "Examine the validity and priority of all claims against the estate." It is necessary for the Assignee to retain an Israeli lawyer to comply with this statutory obligation.

8. By this Motion, the Assignee seeks authority to employ Meir Heller of the Israeli law firm of E. Landau as special counsel. If approved, Mr. Heller will assist the Assignee in reviewing the claims of the Israeli investors, make recommendations on claim objections and generally advise on relevant matters of Israeli law as they may arise during this case.

9. Mr. Heller has been licensed to practice law in Israel since 1996 and maintains an expertise in the areas of commercial law and litigation.

10. Mr. Heller's hourly rate is \$430 per hour. An associate at E. Landau with the hourly rate of \$320 may also work on the matter.

11. Mr. Heller is counsel to principals of the Assignor in Israeli proceedings and is accordingly familiar with the issues in this case. Neither the Assignee nor Mr. Heller believe Mr. Heller's concurrent representations present a conflict of interest.

12. Mr. Heller and E. Landau will maintain records of time expended representing the Assignee and any actual and necessary expenses incurred in connection with the rendering of legal

services described above.

13. Any interim or final requests for compensation by the Assignee or his professionals will be requested by separate motion with notice to creditors.

WHEREFORE, the Assignee requests that the Court enter an order authorizing the employment of Mr. Heller and E. Landau as his counsel on matters of Israeli law and granting such further relief as is deemed just and proper.

Dated: October 27, 2023

**HOFFMAN, LARIN & AGNETTI, P.A.**

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By: /s/ Michael S. Hoffman

**MICHAEL S. HOFFMAN**

Florida Bar No. 41164